



## ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

**Checklist Preparer:** Denise Breen /Assistant Project Scientist February 1, 2013  
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**Site Name:** Former Narvaez Cleaners & Tailoring Facility

**Previous Names (if any):** None

**Site Location:** Dorado del Mar Shopping Ctr  
 (Street)

Dorado, Puerto Rico 00646  
 (City) (ST) (Zip)

**Latitude:** 18.4649575° North **Longitude:** -66.2729233° West

### Describe the release (or potential release) and its probable nature:

Three active public supply wells in Dorado have contamination concentrations above their respective HRS Level I benchmarks of tetrachloroethylene (PCE) and trichloroethylene (TCE). In relation to Former Narvaez Cleaners & Tailoring Facility, these three wells are between 2 and 2½ miles from the site. The dry cleaner operated at this location for an unknown length of time, ending in 1999. Although PCE was used during operation, information regarding disposal of PCE is currently unavailable. Based on the documented use of PCE by the operator of the former facility, a lack of information regarding facility operations and the disposal of waste PCE, and the site being underlain by the karst aquifer known as the North Coast Limestone Aquifer System (NCLAS), the site is being evaluated as having a potential to release.

### Part 1 - Superfund Eligibility Evaluation

If all answers are "no" go on to Part 2, otherwise proceed to Part 3.

|  | YES                                 | NO                                  |
|--|-------------------------------------|-------------------------------------|
| 1. Is the site currently in CERCLIS or an "alias" of another site?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

Please explain all "yes" answer(s).

The site was added to CERCLIS as a result of the Maguayo Site Discovery effort completed in August 2009. The CERCLIS ID is PRN008008773.

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**Part 2 - Initial Site Evaluation**

For Part 2, if information is not available to make a "yes" or "no" response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

If the answer is "no" to any of questions 1, 2, or 3, proceed directly to Part 3.

|   | YES                                 | NO                       |
|---|-------------------------------------|--------------------------|
| 1. Does the site have a release or a potential to release?                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. *Does the site have uncontained sources containing CERCLA eligible substances? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. **Does the site have documented on-site, adjacent, or nearby targets?          | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If the answers to questions 1, 2, and 3 above were all "yes" then answer the questions below before proceeding to Part 3.

|   | YES                                 | NO                                  |
|---|-------------------------------------|-------------------------------------|
| 4. ***Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 7. Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

**Notes:**

\*The answer to Part 2, Question 2 is an assumption for which there is no analytical data. Additional data to verify this assumption is necessary.

\*\*Part 2, Question 3: Although the contaminated wells are located at a distance of greater than 1 mile, the site is underlain by the NCLAS (a karst aquifer).

\*\*\*The answer to Part 2, Question 4 is an assumption based on assumed uncontained sources containing CERCLA eligible substances on site combined with the site being underlain by the NCLAS.

**EXHIBIT 1**  
**SITE ASSESSMENT DECISION GUIDELINES FOR A SITE**

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

| Suspected/Documented Site Conditions  |                   | APA | Full PA | PA/SI | SI  |
|---|-------------------|-----|---------|-------|-----|
| 1. There are no releases or potential to release.   |                   | Yes | No      | No    | No  |
| 2. No uncontained sources with CERCLA-eligible substances are present on site.  |                   | Yes | No      | No    | No  |
| 3. There are no on-site, adjacent, or nearby targets.   |                   | Yes | No      | No    | No  |
| 4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.   | Option 1: APA →SI | Yes | No      | No    | Yes |
|   | Option 2: PA/SI   | No  | No      | Yes   | NA  |
| 5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.  | Option 1: APA →SI | Yes | No      | No    | Yes |
|   | Option 2: PA/SI   | No  | No      | Yes   | NA  |
| 6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site. |                   | No  | Yes     | No    | No  |
| 7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.   |                   | No  | Yes     | No    | No  |

**Part 3 - EPA Site Assessment Decision**

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was "no," then an APA may be performed and the "NFRAP" box below should be checked. Additionally, if the answer to question 4 in Part 2 is "yes," then you have two options (as indicated in Exhibit 1): Option 1 --conduct an APA and check the "Lower Priority SI" or "Higher Priority SI" box below; or Option 2 -- proceed with a combined PA/SI assessment.

**Check the box that applies based on the conclusions of the APA:**

- |  |  |
|--|--|
| <input type="checkbox"/> NFRAP                         | <input type="checkbox"/> Refer to Removal Program - further site assessment needed |
| <input checked="" type="checkbox"/> Higher Priority SI | <input type="checkbox"/> Refer to Removal Program - NFRAP                          |
| <input type="checkbox"/> Lower Priority SI             | <input type="checkbox"/> Site is being addressed as part of another CERCLIS site   |
| <input type="checkbox"/> Defer to RCRA Subtitle C      | <input type="checkbox"/> Other: _____  |
| <input type="checkbox"/> Defer to NRC                  |  |

**Regional EPA Reviewer:**

Jan Hagiwara / Jan Hagiwara  
 Print Name/Signature

3/28/13  
 Date

**PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION:** The High Priority SI decision is based on a lack of sufficient analytical data to exclude the site as a source, the possibility of historical releases of CERCLA-eligible substances, and the site being underlain by the NCLAS karst aquifer.